

EXHIBIT A- Sharon Daniel Declaration

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KEVIN CAMPBELL,

Plaintiff,

DECLARATION OF
SHARON F. DANIEL

-against-

FEDERAL EXPRESS CORPORATION a/k/a
FEDEX EXPRESS, and ERIC WANDERS,
INDIVIDUALLY,

Civil Action No. 1:22-cv-07662-DL

Defendants.
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I, Sharon F. Daniel, declare under penalty of perjury, pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. Defendant Federal Express Corporation (“FedEx”) is a global transportation company with facilities located throughout the world.
2. I have been employed with FedEx as a Senior Paralegal Specialist since 2005.
3. I am over the age of eighteen.
4. As a paralegal, I am familiar with the retrieval of corporate documents and investigate and retrieve business records as a routine part of my job. I am also familiar with employee databases, which provide information about the various positions individuals have held throughout their years of service at FedEx. Based on my review of corporate records, I have personal knowledge of the facts stated herein, and I affirm that they are true and correct. If called as a witness, I could and would competently testify to the same.
5. I am a custodian of records for FedEx and am, therefore, familiar with personnel records and data compiled and maintained by FedEx in the ordinary course of business.
6. The following exhibits marked in Defendants Federal Express Corporation and Eric Warnders’ Statement of Undisputed Material Facts in Support of Motion for Summary were made

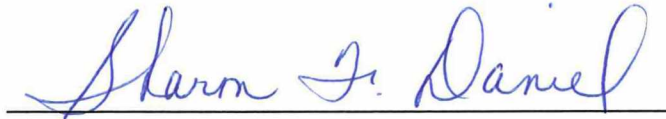
at or near the time of the act or event they purport to establish by someone with knowledge, were kept in the course of regularly conducted business activity and were made in accordance with regular FedEx practices.¹

- **Defendants' Exhibit C** – Campbell Training History
- **Defendants' Exhibit D** – Campbell Offer Letter/Employment Agreement
- **Defendants' Exhibit E** – Campbell Earnings
- **Defendants' Exhibit G** – Alzate Station File Excerpt
- **Defendants' Exhibit H** – GFTP Correspondence and Rationale
- **Defendants' Exhibit I** – IEEO Documents
- **Defendants' Exhibit J** – Malebranche File Excerpt
- **Defendants' Exhibit M** – Lorenzi Investigation and Suspension
- **Defendants' Exhibit N** – FedEx IEEO Policy

¹ In addition, all of these documents were produced to Plaintiff during the discovery phase of this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED, this the 18th day of November 2024.



Sharon F. Daniel
Federal Express Corporation
Senior Paralegal Specialist